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ATTORNEY AT LAW

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Application granted. But this is not a particularly complex case so 50 hours should be more than sufficient.

March 11, 2023

VIA ECF

SO ORDERED.


CATHY SEIBEL, U.S.D.J.

3/13/23

Honorable Cathy Seibel
U.S. District Court Judge
The Hon. Charles L. BRIANT Jr.
Federal Building and United States Courthouse
300 Quarropas Street
White Plains, NY 10601

Re: *United States v. Hoover Joyner*, 23-cr-12 (CS)

Dear Judge Seibel:

I was appointed substitute CJA counsel on March 2, 2023. I write, respectfully, pursuant to the Criminal Justice Act, to request the appointment of associate counsel to assist in the above referenced case. Specifically, I am requesting the appointment of Diane Ferrone, Esq. at an hourly rate of \$110, with approval of 50 hours. Ms. Ferrone has been appointed associate counsel on numerous CJA cases in the Southern District of New York and she and I are currently working together on several matters.

Mr. Joyner is charged with one count of a felon in possession of a firearm pursuant to 18 U.S.C. Section 922(g).

If appointed, Ms. Ferrone would assist with, among other things, reviewing discovery, researching legal issues, investigating the relevant factual background and defenses, drafting motions, and preparing for Mr. Joyner's defense at trial.

I am highly conscious of the importance of preventing the needless expenditure of CJA funds. Consistent with the goals of conserving resources, I believe the appointment of Ms. Ferrone in this case will result in substantial savings by relieving me from performing tasks that would be more expensive due to my higher bill rate.

Thank you for your consideration in this matter. I am, of course, available to provide more information at the Court's convenience.

Respectfully submitted,

/s Francis L. O'Reilly

Francis Lee O'Reilly

cc: All Parties (via ECF)